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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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DEC 29 1997

In the Matter of)
Administration of the)
North American Numbering Plan,)
Carrier Identification Codes (CICs))

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
CC Docket No. 92-237

OPPOSITION OF AT&T CORP.

Pursuant to Section 1.429 of the Commission's Rules, 47 C.F.R. § 1.429, and the Commission's Public Notice, Report No. 2242, released December 8, 1997 and published December 12, 1997 (62 Fed. Reg. 65427), AT&T Corp. ("AT&T") submits this opposition to BellSouth's petition for clarification of a limited portion of the CIC Reconsideration Order in this docket.¹

In the CIC Code Reconsideration Order (paras. 4, 20, 25-27), the Commission determined that the transition for conversion from three-digit Feature Group D Carrier Identification Codes ("CICs") to four-digit CICs will end for interexchange carriers ("IXCs") on June 30, 1998.² In

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¹ In the Matter of Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, FCC 97-386, released October 22, 1997 ("CIC Reconsideration Order").

² The three-digit CIC is part of a five-digit carrier access code (10XXX), whereas the four-digit CIC is part

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reaching this determination, the Commission found that shortening the transition period during which both the three-digit and four-digit CICs and their respective five-digit and seven-digit carrier access code ("CAC") dialing arrangements would be recognized will serve the overall procompetitive purposes of the 1996 Telecommunications Act. Yet, in consideration of the needs of IXCs and others to educate their customers to the new dialing arrangement, it created a two-step transition, requiring local exchange carriers ("LECs") with equal access capability to recognize four-digit CICs by January 1, 1998 and IXCs by June 30, 1998, after which time only CICs four-digits in length would be recognized (para. 4).

In its clarification petition, BellSouth (at 2, 5) states that, although it will have completed all changes necessary to recognize four-digit CICs by January 1, 1998, it asks for permission not to commence blocking three-digit CICs until June 30, 1998, a process which will take approximately sixty days or until September 1, 1998. As a result, if this clarification were granted, at least some

(footnote continued from previous page)

of a seven-digit carrier access code (101XXXX). During the transition period, both three-digit and four-digit CICs could be utilized. Once the transition period is over, all customers would be required to use the four-digit CIC (thus, AT&T's carrier access code would then become 1010288).

calls using three-digit CICs will complete after June 30, 1998, the scheduled end of the IXC transition period.

The Commission has thoroughly considered and reviewed the issue of when the transition period should end and has arrived at the schedule identified above. At this juncture, there is no need for further clarification as BellSouth requests. Instead, if BellSouth needs two months to comply fully with the June 30, 1998 cutover date, then it should commence its efforts before May 1.

In all events, the CIC Reconsideration Order (para. 26) requires LECs to offer "a standard intercept message beginning on or before June 30, 1998, explaining that a dialing pattern change has occurred and instructing the caller to contact its IXC for further information" (emphasis added). The Commission further directed that "LECs must consult with IXCs and reach agreement on the content of the message and on the period of time during which the message will be provided." *Id.* Thus, if BellSouth needs to employ a phased approach to blocking three-digit CICs in its network, then it should have the intercept message in place at the time a particular switch is cutover to ensure that consumers will be able to obtain appropriate dialing instructions.

The need to adhere to the June 30, 1998 conversion date is compelling. The Commission decided to end the transition as soon as practicable to lessen any negative effects of the disparity that may arise during the

transition.³ The Commission's ultimate solution is to put all carriers at parity by requiring identical dialing patterns.⁴ America One's petition for reconsideration underscores that the current dialing disparity has an adverse impact on new "dial around" providers that rely on four-digit codes. While AT&T believes that it is unnecessary and inadvisable to again reconsider the June 30, 1998 date as America One requests, there is certainly no basis to, in effect, extend it.

³ In the Matter of Administration of the North American Numbering Plan Carrier Identification Codes (CICs), CC Docket No. 92-237, Second Report and Order, FCC 97-125, released April 11, 1997, para. 32 ("Second Report").

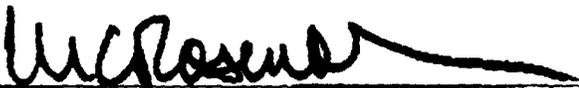
⁴ See also Pennsylvania Public Utility Commission Petition for Expedited Waiver of 47 CFR Section 52.19 for Area Code 412 Relief, CC Docket 96-98, Order, DA 97-675, released April 4, 1997, para. 15 (recognizing the inherent competitive advantage of dialing fewer digits), citing Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Second Report and Order, FCC 96-333, 61 Fed. Reg. 47284, 47330 (1996).

CONCLUSION

WHEREFORE, the Commission should deny BellSouth's petition for clarification and adhere to the June 30, 1998 mandatory IXC transition date for conversion to the four-digit CIC codes.

Respectfully submitted,

AT&T CORP.

By 

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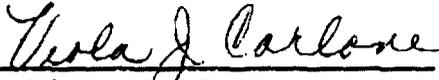
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December 29, 1997

CERTIFICATE OF SERVICE

I, Viola J. Carlone, do hereby certify that on this 29th day of December, 1997, a copy of the foregoing Opposition of AT&T Corp. was mailed by U.S. first class mail, postage prepaid, to the parties on the attached Service List.



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